

Exhibit B

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TAMMY BARKER, TIMOTHY ROBERT)
BARKER, AND MELISA MERRYMAN, ON)
BEHALF THEMSELVES AND ON BEHALF)
OF THOSE SIMILARLY SITUATED,)

Plaintiffs,)

vs.)

LOCAL 150, INTERNATIONAL UNION)
OF OPERATING ENGINEERS, AFL-CIO,)

Defendant.)

ORIGINAL

No. 08 C 50015

The deposition of LINDA
SORIA, taken before GARY SCHNEIDER, CSR, RPR, within
and for the State of Illinois, pursuant to the
Federal Rules of Civil Procedure for the United
States District Courts pertaining to the taking of
depositions, at 3500 Three First National Plaza, 70
West Madison, Chicago, IL, 60602 , commencing at 1:00
p.m., on May 28, 2008.

1 A P P E A R A N C E S

2 S. IRA MILLER

3 111 West Washington Street

4 Suite 1900

5 Chicago, IL 60602

6 (312) 372-2215

7 By: S. Ira Miller
8 On behalf of Linda Soria;

9 UNGARETTI & HARRIS

10 3500 Three First National Plaza

11 70 West Madison

12 Chicago, IL, 60602

13 (312) 977-4883

14 By: Mr. Dean Polales,
15 On behalf of Tammy Barker, Timothy
16 Robert Barker, and Melisa Merryman;

17 LOCAL 150 OF THE INTERNATIONAL UNION OF

18 OPERATING ENGINEERS

19 6140 Joliet Road

20 Countryside, IL, 60525

21 (708) 579-6663

22 By: Mr. Bryan P. Diemer,
23 Ms. Lauren S. Shapiro, on behalf of Local
24 150 of the International Union of Operating
 Engineers;

A P P E A R A N C E S (Continued)

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14212 Washington Street

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Woodstock, IL 60098

(815) 206-2200

By: Mr. Robert T. Hanlon
on behalf of Local 150 of the International
Union of Operating Engineers.

1 MR. POLALES: Okay. Can you swear the
2 witness.

3 (Witness sworn.)

4 MR. POLALES: Would you state your
5 name, please, and spell your last name.

6 THE WITNESS: Linda Soria, S-o-r-i-a.

7 MR. POLALES: Hi, Ms. Soria. My name
8 is Dean Polales. We've met before, but I want to
9 tell you on the record I am one of the attorneys for
10 the plaintiffs in this case, which is a case brought
11 by Tammy Barker, Timothy Barker, and a lady named
12 Melissa Merryman, against Local 150 of the
13 International Union of Operating Engineers.

14 We're taking this deposition pursuant
15 to the Federal Rules of Civil Procedure and the local
16 rules of court for the U.S. District Court for the
17 Northern District of Illinois.

18 It's now about 1:04 in the afternoon.

19 Linda Soria,
20 Having been called as a witness and having been first
21 duly sworn, was examined and testified as follows:

22 DIRECT EXAMINATION

23 BY MR. POLALES:

24 Q I would ask you, have you ever given

1 testimony before?

2 A In a divorce case.

3 Q And was that in a courtroom or was that at
4 a deposition like this?

5 A It was in a courtroom.

6 Q And during this deposition, I'll ask you a
7 series of questions that I think are about this
8 lawsuit, facts associated with it. And it's
9 important that you answer each question verbally
10 rather than with a nod of the head --

11 A Okay.

12 Q -- or a shake of the head so that the court
13 reporter can take down your answers.

14 If I ask you a question, which
15 sometimes I do, that doesn't seem to make sense,
16 please tell me, and I'll try and rephrase the
17 question so that it's understandable.

18 Sometimes counsel for the defendant,
19 Mr. Diemer --

20 MR. POLALES: I'm sorry. I forgot
21 your last --

22 MS. SHAPIRO: Shapiro.

23 BY MR. POLALES:

24 Q Ms. Shapiro may object to a question that I

1 ask. Just wait for their objection, listen to it,
2 and then we'll go on from there.

3 You're represented by counsel here
4 today, yes?

5 A Yes.

6 Q And that's Mr. Ira Miller --

7 MR. MILLER: Yes.

8 MR. POLALES: -- correct?

9 BY MR. POLALES:

10 Q And I don't know if you've met all of the
11 counsel. I know that Rob Hanlon, who is sitting next
12 to me, who is an attorney for the plaintiff, has
13 introduced himself to you.

14 And I presume you've had an
15 opportunity to at least talk with Mr. Diemer. He
16 represents Local 150, as does Ms. Shapiro, okay?

17 So this divorce case that you
18 testified about before, was that a state court or a
19 federal court case, if you know?

20 A A state.

21 Q And can you tell me how far you went in
22 school, Ms. Soria?

23 A How far I went to school?

24 Q In school, yeah. Did you finish high

1 school? Go to college?

2 A Two years of college.

3 Q Two years of college?

4 A Um-hmm.

5 Q What was your major in college, if you had
6 one?

7 A Business.

8 Q And what is your birth date, ma'am?

9 A December 1st, 1948.

10 Q Do you have a driver's license?

11 MR. MILLER: Now, prior to her
12 answering any further questions, I intend to have her
13 assert her privilege under the Fifth Amendment.

14 However, we will let some of your
15 questions get answered if you agree that you will not
16 contend that any of the answers we allow her to make
17 will not constitute grounds for waiver of her Fifth
18 Amendment privilege.

19 MR. POLALES: Well, I think we'll have
20 to go case by case on that, Mr. Miller.

21 MR. MILLER: Okay.

22 MR. POLALES: Okay? Or question by
23 question on that, I should say.

24 BY MR. POLALES:

1 Q Do you have a driver's license with you?

2 A Yes.

3 Q May I see it, please.

4 Your driver's license, rather than
5 mark it as an exhibit, I'll just lean over your
6 shoulder and ask you if I'm reading this exactly.

7 Your driver's license says you are
8 Linda M. Soria of 16152 South Leach Drive, Lockport,
9 Illinois, 60441, and that your driver's license
10 number is S600-5334-8942, issued on November 30th,
11 '02, and expiring on 12/01/06.

12 A Well, actually --

13 Q Did I get it right?

14 A -- I got it renewed.

15 Q You got it renewed on the back.

16 A From four years from the expiration on the
17 face of this --

18 Q Okay.

19 A -- license.

20 Q Was the rest of it right that I read?

21 A Yeah.

22 Q Okay. And your birth date is 12/1/48.
23 You're '5 "4, 150 pounds, with --

24 A Well, they never --

1 Q -- eyes of blue. They didn't --

2 A -- adjusted that.

3 Q -- correct it?

4 A Yeah.

5 Q But that's what it says; is that correct?

6 A Yeah, um-hmm.

7 Q And you have organization, where it says
8 type and class, it says DM, and restriction says B.

9 Do you know what that is?

10 MR. MILLER: Objection -- well,
11 objection.

12 MR. POLALES: You're going to instruct
13 the witness?

14 MR. MILLER: Kindly assert your
15 privilege under the Fifth Amendment.

16 THE WITNESS: Okay. I respectfully
17 refuse to testify based on my privilege against
18 self-incrimination under the Fifth Amendment to the
19 United States Constitution.

20 MR. POLALES: Okay.

21 BY MR. POLALES:

22 Q For the record, did I read it correctly?

23 A Yes.

24 Q Okay. And, ma'am, where did you grow up?

1 A Chicago.

2 Q Do you have any children?

3 A Yes.

4 Q How many?

5 A Four.

6 Q Are they all grown?

7 A Yes.

8 Q All out of the house?

9 A Yes.

10 Q And you were served with a subpoena for
11 your appearance here today?

12 A Yes.

13 Q And did that subpoena request that you
14 furnish documents? Do you remember?

15 A Yeah.

16 MR. DIEMER: I'm going to just make an
17 observation for the record. The last time we
18 appeared in front of Judge Mahoney, Mr. Hanlon
19 advised the court that Mr. Hanlon was going to advise
20 the witness that she not -- it was not necessary to
21 bring any documents to this deposition.

22 MR. HANLON: That's correct.

23 MR. POLALES: Oh, you did?

24 MR. HANLON: I did.

1 MR. POLALES: Okay.

2 BY MR. POLALES:

3 Q Do you remember whether the subpoena asked
4 you to furnish documents?

5 A It did.

6 Q And were you advised that you didn't have
7 to bring any documents today?

8 A No.

9 Q Okay. Well --

10 A But I don't have any, so...

11 Q -- that's okay.

12 Have you had any discussions with
13 anyone in law enforcement in the last two years about
14 Local 150?

15 A I respectfully refuse to testify based on
16 my privilege against self-incrimination under the
17 Fifth Amendment to the United States Constitution.

18 Q Okay. And have you talked to anyone from
19 federal law enforcement in particular about Local
20 150?

21 A I respectfully refuse to testify based on
22 my privilege against self-incrimination under the
23 Fifth Amendment to the United States Constitution.

24 Q Has anyone from law enforcement indicated

1 to you, implied to you, given you any hints about
2 whether or not you're the subject of any law
3 enforcement inquiry?

4 A I respectfully refuse to testify based on
5 my privilege against self-incrimination under the
6 Fifth Amendment to the United States Constitution.

7 Q Has anyone from law enforcement ever
8 threatened you in any way in the last two years?

9 A I respectfully refuse to testify based on
10 my privilege against self-incrimination under the
11 Fifth Amendment to the United States Constitution.

12 Q Has anyone associated with law enforcement
13 ever told you or given you an indication that you
14 would not be prosecuted in the last two years?

15 A I respectfully refuse to testify based on
16 my privilege against self-incrimination under the
17 Fifth Amendment to the United States Constitution.

18 Q Have you ever talked to anyone from the FBI
19 in the last two years?

20 A I respectfully refuse to testify based on
21 my privilege against self-incrimination under the
22 Fifth Amendment to the United States Constitution.

23 Q And if I asked you any other questions
24 about what, if any, contacts you've had with law

1 enforcement over the last two years, would your
2 answers be the same?

3 A I respectfully refuse to testify based on
4 my privilege against self-incrimination under the
5 Fifth amendment to the United States --

6 MR. MILLER: Her answers would --

7 THE WITNESS: -- Constitution.

8 MR. MILLER: -- be the same.

9 THE WITNESS: Would be the same.

10 MR. POLALES: Okay.

11 BY MR. POLALES:

12 Q So would you assert the same Fifth
13 Amendment privilege in answer to any other question I
14 could ask you about contacts with law enforcement of
15 any kind over the last two years?

16 A Yes.

17 Q Is that true?

18 A True.

19 Q Are you currently employed, ma'am?

20 A No.

21 Q What was your last employment?

22 A I did clerical work for an attorney last
23 year.

24 Q And the kind of clerical work that consists

1 of filing or typing or both?

2 A Notaries, when they needed it, you know.

3 Q Did you go to a place of work or work out
4 of your house?

5 A I worked out of my home and sometimes at
6 their office.

7 Q And who was that attorney?

8 A Horwitz.

9 Q And where does he live or work?

10 A I was in the -- out of the Joliet office.

11 Q So Mr. Horwitz has a practice in Joliet?

12 A Yeah.

13 Q Is it a private practice? Does he work for
14 a company?

15 A Yeah.

16 Q How long did you work for him?

17 A Just a few months after I retired, just to
18 help supplement my income for a while.

19 Q Can you give me the time frame, from when
20 to when?

21 A Gosh, I'm not sure exactly. It might have
22 been from January 2007 to maybe August.

23 Q Might it have been as early as October of
24 '06 through August of '07?

1 A You know, it might have been, but I don't
2 remember exactly.

3 Q Prior to working for that attorney, you say
4 you had retired?

5 A Um-hmm.

6 Q And where did you retire from?

7 A Local 150.

8 Q And what were your dates of employment by
9 Local 150?

10 A May 3rd, 1993, to October, like
11 October 1st, 2006.

12 Q Okay. And during the period of time that
13 you worked at Local 150 -- when you say "Local 150,"
14 are you referring to Local 150 of the International
15 Union of Operating Engineers, the defendant in this
16 case?

17 A Yes.

18 Q And during that period of time, can you
19 tell me what job responsibilities or duties you had?

20 A I respectfully refuse to testify based on
21 my privilege against self-incrimination under the
22 Fifth Amendment to the United States Constitution.

23 Q How did you obtain your employment at Local
24 150?

1 A I respectfully refuse to testify based on
2 my privilege against self-incrimination under the
3 Fifth Amendment to the United States Constitution.

4 Q You came to leave your employment at Local
5 150 and retired with a pension effective October 1st,
6 2006; is that correct?

7 A Yes.

8 Q Can you tell me why you decided to leave
9 your employment and retire?

10 A I respectfully refuse to testify based on
11 my privilege against self-incrimination under the
12 Fifth Amendment to the United States Constitution.

13 Q Before you retired, were you the executive
14 to a man named Joe Ward?

15 A I respectfully refuse to testify based on
16 my privilege against self-incrimination under the
17 Fifth Amendment to the United States Constitution.

18 Q Before you retired, did you hold a position
19 in the accounting department?

20 A I respectfully refuse to testify based on
21 my privilege against self-incrimination under the
22 Fifth Amendment to the United States Constitution.

23 Q Can you tell me what functions that you had
24 in the last two years before you retired from Local

1 150?

2 A I respectfully refuse to testify based on
3 my privilege against self-incrimination under the
4 Fifth Amendment to the United States Constitution.

5 Q In the last, let's say, five or six years,
6 let's say six years before you retired, did you do
7 secretarial work for Joe Ward?

8 A I respectfully refuse to testify based on
9 my privilege against self-incrimination under the
10 Fifth Amendment to the United States Constitution.

11 Q Did you make sure that leases were current?

12 A I respectfully refuse to testify based on
13 my privilege against self-incrimination under the
14 Fifth Amendment to the United States Constitution.

15 Q Did you deal with landlord-type problems?

16 A I respectfully refuse to testify based on
17 my privilege against self-incrimination under the
18 Fifth Amendment to the United States Constitution.

19 Q Did you have some duties with respect to
20 insurance?

21 A I respectfully refuse to testify based on
22 my privilege against self-incrimination under the
23 Fifth Amendment to the United States Constitution.

24 Q Ma'am, did you run plates, that is, motor

1 vehicle license plates, for the business agents of
2 Local 150?

3 A I respectfully refuse to testify based on
4 my privilege against self-incrimination under the
5 Fifth Amendment to the United States Constitution.

6 Q Ma'am, can you tell me if your retirement
7 was forced upon you in your view?

8 A I respectfully refuse to testify based on
9 my privilege against self-incrimination under the
10 Fifth Amendment to the United States Constitution.

11 Q Why did you decide to retire? I may have
12 asked it. I'm sorry if I did.

13 A I respectfully refuse to testify based on
14 my privilege against self-incrimination under the
15 Fifth Amendment to the United States Constitution.

16 Q Is it true that in 2006, Local 150 members,
17 including Mr. Ward and Jim Miller, used you as their
18 secretary?

19 A I respectfully refuse to testify based on
20 my privilege against self-incrimination under the
21 Fifth Amendment to the U.S. Constitution.

22 Q Is it true that Mr. Ward and Mr. Miller put
23 together a slate of candidates to run for office in
24 the Local 150 elections in about the spring of 2006?

1 A I respectfully refuse to testify based on
2 my privilege against self-incrimination under the
3 Fifth Amendment to the U.S. Constitution.

4 Q Is it true that after that occurred,
5 Mr. Dugan started firing staff at the Local,
6 including Mr. Miller and Mr. Allen?

7 A I respectfully refuse to testify based on
8 my privilege against self-incrimination under the
9 Fifth Amendment to the U.S. Constitution.

10 Q And is it true that a number of BAs were
11 fired as well in about July of 2007?

12 A I respectfully refuse to testify based on
13 my privilege against self-incrimination under the
14 Fifth Amendment to the U.S. Constitution.

15 Q In or about September of 2006, did
16 Mr. Dugan call you to your office and tell you that
17 Mr. Ward wouldn't be needing a secretary anymore and
18 he was going to find a different position for you?

19 A Yeah, I respectfully refuse to testify
20 based on my privilege against self-incrimination
21 under the Fifth Amendment to the U.S. Constitution.

22 Q Did Mr. Dugan then call Mr. Garza
23 (phonetic) in and ask him to find a spot for you?

24 A I respectfully refuse to testify based on

1 my privilege against self-incrimination under the
2 Fifth Amendment to the U.S. Constitution.

3 Q Did Mr. Dugan then assign you to an
4 accounting position?

5 A I respectfully refuse to testify based on
6 my privilege against self-incrimination under the
7 Fifth Amendment to the U.S. Constitution.

8 Q And after that, did you find that you were
9 locked out of your computer?

10 A I respectfully refuse to testify based on
11 my privilege against self-incrimination under the
12 Fifth Amendment to the U.S. Constitution.

13 Q The following day, were you given a desk
14 and a computer in the accounting area on the first
15 floor?

16 A Yeah, I respectfully refuse to testify
17 based on my privilege against self-incrimination
18 under the Fifth Amendment to the U.S. Constitution.

19 Q And were you not provided with a computer
20 access password so that you basically couldn't do
21 anything?

22 A I respectfully refuse to testify based on
23 my privilege against self-incrimination under the
24 Fifth Amendment to the U.S. Constitution.

1 MR. POLALES: Let me just have a
2 moment.

3 (Brief pause.)

4 BY MR. POLALES:

5 Q Were you instructed to write down your job
6 description?

7 A I respectfully refuse to testify based on
8 my privilege against self-incrimination --

9 Q Did you write down some of your job
10 description?

11 A -- under the Fifth Amendment to the U.S.
12 Constitution.

13 Q And did you work a lot of overtime?

14 A I respectfully refuse to testify based on
15 my privilege against self-incrimination under the
16 Fifth Amendment to the U.S. Constitution.

17 Q After you were assigned to accounting, were
18 you told that you would not get any overtime?

19 A I respectfully refuse to testify based on
20 my privilege against self-incrimination under the
21 Fifth Amendment to the U.S. Constitution.

22 Q While you were employed by Local 150, did
23 you ever gain knowledge or information that Local 150
24 had obtained motor vehicle records containing

1 personal information from the Secretary of State of
2 Illinois?

3 A I respectfully refuse to testify based on
4 my privilege against self-incrimination under the
5 Fifth Amendment to the U.S. Constitution.

6 Q While you were employed at Local 150, did
7 you ever gain or obtain any information that Local
8 150 obtained personal information contained in motor
9 vehicle records of the State of Illinois?

10 A I respectfully refuse to testify based on
11 my privilege against self-incrimination under the
12 Fifth Amendment to the U.S. Constitution.

13 Q Ms. Soria, did you -- I'm sorry. I didn't
14 mean to cut off your answer.

15 MR. POLALES: You got it, right?

16 THE COURT REPORTER: Um-hmm.

17 MR. POLALES: Okay. They're all the
18 same.

19 MR. DIEMER: He's quick.

20 BY MR. POLALES:

21 Q Ms. Soria, did you happen to obtain
22 information while you were employed at Local 150 that
23 Local 150 had obtained computer disks from the State
24 of Illinois?

1 A I respectfully refuse to testify based on
2 my privilege against self-incrimination under the
3 Fifth Amendment to the U.S. Constitution.

4 Q And what about information that you
5 obtained while you were working at Local 150 that
6 Local 150 had obtained other forms of media
7 containing motor vehicle records of individuals and
8 businesses in the State of Illinois?

9 A I respectfully refuse to testify based on
10 my privilege against self-incrimination under the
11 Fifth Amendment to the U.S. Constitution.

12 Q Can you tell me in what form you saw, if
13 you did, the Illinois Secretary of State deliver
14 motor vehicle records to Local 150?

15 A I respectfully refuse to testify based on
16 my privilege against self-incrimination under the
17 Fifth Amendment to the U.S. Constitution.

18 Q Can you tell me how many times Local 150
19 obtained motor vehicle records from the Illinois
20 Secretary of State?

21 A I respectfully refuse to testify based on
22 my privilege against self-incrimination under the
23 Fifth Amendment to the U.S. Constitution.

24 Q Did you ever see the contents of the disks

1 Local 150 obtained which contained personal
2 information such as a driver's license number or home
3 address?

4 A I respectfully refuse to testify based on
5 my privilege against self-incrimination under the
6 Fifth Amendment to the U.S. Constitution.

7 Q Did Local 150, to your knowledge, ever
8 obtain microfiche from the Illinois Secretary of
9 State containing personal information from motor
10 vehicle records?

11 A I respectfully refuse to testify based on
12 my privilege against self-incrimination under the
13 Fifth Amendment to the U.S. Constitution.

14 MR. POLALES: Okay. We'll take a
15 short break, 30 seconds. Is that going to be enough?

16 (Brief recess.)

17 BY MR. POLALES:

18 Q So, Ms. Soria, did you ever obtain, during
19 of course of your employment at Local 150, access to
20 Illinois Secretary of State motor vehicle records?

21 A I respectfully refuse to testify based on
22 my privilege against self-incrimination under the
23 Fifth Amendment to the U.S. Constitution.

24 Q During your employment at Local 150, did

1 you obtain possession of computer disks from the
2 Illinois Secretary of State containing personal
3 information from motor vehicle records?

4 A I respectfully refuse to testify based on
5 my privilege against self-incrimination under the
6 Fifth Amendment to the U.S. Constitution.

7 Q And, ma'am, did you also obtain possession,
8 during your employment at Local 150, of microfiche
9 containing personal information from motor vehicle
10 records from the State of Illinois?

11 A I respectfully refuse to testify based on
12 my privilege against self-incrimination under the
13 Fifth Amendment to the United States Constitution.

14 Q Ma'am, did you become aware that Local 150
15 paid for motor vehicle records from the Illinois
16 Secretary of State?

17 A I respectfully refuse to testify based on
18 my privilege against self-incrimination under the
19 Fifth Amendment to the United States Constitution.

20 Q In fact, ma'am, isn't it true that part of
21 your job at Local 150 was handling of and causing
22 checks to be signed by Mr. Dugan; isn't that true?

23 A I respectfully refuse to testify based on
24 my privilege against self-incrimination under the

1 Fifth Amendment to the United States Constitution.

2 Q And didn't you cause checks to be made out
3 and signed by an officer of the Local in order to pay
4 for motor vehicle records from the Illinois Secretary
5 of State?

6 A I respectfully refuse to testify based on
7 my privilege against self-incrimination under the
8 Fifth Amendment to the U.S. Constitution.

9 Q And didn't you do that within the last four
10 years of your employment?

11 A I respectfully refuse to testify based on
12 my privilege against self-incrimination under the
13 Fifth Amendment to the U.S. Constitution.

14 Q And, ma'am, can you tell me when Local 150
15 obtained motor vehicle records containing personal
16 information from the State of Illinois?

17 A I respectfully refuse to testify based on
18 my privilege against self-incrimination under the
19 Fifth Amendment to the United States Constitution.

20 Q I already asked you, ma'am, did business
21 agents call you to ask you to check on motor vehicle
22 record information. But let me ask you in that
23 context, did you write down license plates that you
24 checked against motor vehicle data provided to Local

1 150 by the Illinois Secretary of State?

2 A I respectfully refuse to testify based on
3 my privilege against self-incrimination under the
4 Fifth Amendment to the U.S. Constitution.

5 Q After you were assigned to accounting in
6 your employment at Local 150, did you have any
7 discussion with Mr. Dugan again after that?

8 A I respectfully refuse to testify based on
9 my privilege against self-incrimination under the
10 Fifth Amendment to the United States Constitution.

11 Q Do you know Bill Dugan?

12 A Yes.

13 Q Okay. During the course of your
14 employment, you had occasion to deal with him?

15 A I respectfully refuse to testify based on
16 my privilege against self-incrimination under the
17 Fifth Amendment to the U.S. Constitution.

18 Q Ma'am, can you tell me whether you worked
19 with a lady named Peggy in accounting?

20 A I respectfully refuse to testify based on
21 my privilege against self-incrimination under the
22 Fifth Amendment to the U.S. Constitution.

23 Q At Local 150, did you work with Judy in
24 accounting?

1 A I respectfully refuse to testify based on
2 my privilege against self-incrimination under the
3 Fifth Amendment to the United States Constitution.

4 Q Did you work with Sandy in accounting?

5 A I respectfully refuse to testify based on
6 my privilege against self-incrimination under the
7 Fifth Amendment to the U.S. Constitution.

8 Q Did you work with John in accounting?

9 A I respectfully refuse to testify based on
10 my privilege against self-incrimination under the
11 Fifth Amendment to the U.S. Constitution.

12 Q Ma'am, did you have -- after you left your
13 employment at Local 150, after you left your
14 employment at Local 150, did you work pretty much
15 full time on the campaign of Mr. Ward and Mr. Miller,
16 slate candidates, the period after you were
17 employed -- you retired, after you retired?

18 A I volunteered.

19 Q Okay. So you worked hard on that?

20 A Yes.

21 Q Okay. And about how long did that take?
22 How many months?

23 A I don't understand.

24 Q Well, as I understand it, you retired on

1 about October 1st, effective October 1st of 2006.
2 You worked on -- I don't know the time line in my
3 head, so I'm asking you to give me the time line of
4 what the election -- kind of campaign from that time
5 to the time of the election.

6 A The election was over August 25th or 6th or
7 something.

8 Q Of 2007?

9 A Um-hmm.

10 Q Okay. So over the course of the next,
11 let's say, October of '06 to August of '07, did you
12 put time in working on the campaign?

13 A Yes.

14 Q Okay. And you would say you worked hard on
15 that?

16 A That's true.

17 Q Okay. You say it is true in your
18 estimation --

19 A Um-hmm.

20 Q -- right?

21 Did anyone ever accuse you of
22 misconduct while you were working at Local 150 for
23 doing campaign work on union time?

24 A I respectfully refuse to testify based on

1 my privilege against self-incrimination under the
2 Fifth Amendment to the United States Constitution.

3 Q Okay. Have you discussed -- aside from
4 discussions that you had with Mr. Miller after you
5 retained him as your lawyer -- by the way, I didn't
6 ask you that, but you have retained Mr. Miller as
7 your lawyer --

8 A Yes.

9 Q -- in connection with your appearance here
10 today?

11 A Yes.

12 Q And aside from discussions you had with
13 Mr. Miller after you retained him as your lawyer,
14 have you discussed this lawsuit with any other
15 lawyers?

16 MR. MILLER: Time frame. Ever?

17 MR. POLALES: Yeah. This lawsuit.

18 MR. MILLER: And I assume --

19 MR. POLALES: Limited to this lawsuit.

20 MR. MILLER: I assume you're excluding
21 Hanlon and yourself?

22 MR. POLALES: No, I'm not.

23 MR. MILLER: Okay.

24 MR. POLALES: Any other lawyers. Then

1 we'll go one at a time, if she's willing to tell me
2 who she discussed it with.

3 THE WITNESS: I respectfully refuse to
4 testify based on my privilege against
5 self-incrimination under the Fifth Amendment to the
6 U.S. Constitution.

7 MR. POLALES: Okay.

8 BY MR. POLALES:

9 Q More specifically, did you discuss this
10 lawsuit, the subject matter of this lawsuit, with
11 anyone from Local 150?

12 A I respectfully refuse to testify based on
13 my privilege against self-incrimination under the
14 Fifth Amendment to the U.S. Constitution.

15 Q Okay. Have you had occasion to meet
16 Mr. Diemer before, before today?

17 MR. MILLER: One moment.

18 THE WITNESS: Yes.

19 BY MR. POLALES:

20 Q And did you meet him before today in person
21 or over the telephone?

22 A In person.

23 Q Okay. And when was that?

24 A When I worked at the Local.

1 Q Okay. So your employment overlapped with
2 Mr. Diemer's?

3 A Um-hmm, yes.

4 Q But since you left the Local, have you met
5 with him in person to discuss matters relating to
6 this lawsuit in person?

7 A I respectfully refuse to testify based on
8 my privilege against self-incrimination under the
9 Fifth Amendment to the U.S. Constitution.

10 Q Have you talked to Ms. Shapiro since the
11 lawsuit was filed about this lawsuit?

12 A No.

13 Q Have you talked to Mr. Pearson about the
14 lawsuit --

15 A No.

16 Q -- since the lawsuit was filed?

17 Did you receive a letter from
18 Mr. Pearson advising you or telling you in one way or
19 the other to get a lawyer?

20 A Yes.

21 Q You didn't bring it with you?

22 MR. POLALES: Do we have a copy of it?

23 MR. HANLON: I can get a copy. Do you
24 mind if I step out?

1 MR. POLALES: Is it in your briefcase?

2 MR. HANLON: It may be.

3 MR. POLALES: Okay. We'll come back
4 to it. Remind me. But you can go and get it.

5 MR. HANLON: All right.

6 MR. POLALES: Okay.

7 BY MR. POLALES:

8 Q And that would have been within the last
9 couple of weeks?

10 MR. MILLER: If you recall.

11 THE WITNESS: It seems like it, yeah.

12 MR. POLALES: Okay.

13 BY MR. POLALES:

14 Q Relatively recently?

15 A Recent, we have.

16 Q But you did not talk to Mr. Pearson about
17 the lawsuit?

18 A No.

19 Q Okay. After you got the letter from
20 Mr. Pearson, then you retained Mr. Miller?

21 A Yes.

22 Q Okay. Did Mr. Diemer call you on the
23 telephone and talk to you about your having signed an
24 affidavit, whether you had signed an affidavit in

1 connection with this lawsuit?

2 A I respectfully refuse to testify based on
3 my privilege against self-incrimination under the
4 Fifth Amendment to the U.S. Constitution.

5 Q Did Mr. Diemer ask you about the contents
6 of an affidavit and whether you signed one?

7 A I respectfully refuse to testify based on
8 my privilege against self-incrimination under the
9 Fifth Amendment to the U.S. Constitution.

10 Q Did you tell Mr. Diemer that it was part of
11 your job to deal with the database from the secretary
12 of state containing motor vehicle record information?

13 A I respectfully refuse to testify based on
14 my privilege against self-incrimination under the
15 Fifth Amendment to the U.S. Constitution.

16 Q Did you tell Mr. Diemer, in substance, that
17 when you didn't have the database, you'd call a guy
18 named Mr. Lombardo, and he would get the information
19 you needed over the phone from motor vehicle records?

20 A I respectfully refuse to testify based on
21 my privilege against self-incrimination under the
22 Fifth Amendment to the U.S. Constitution.

23 Q And did you tell Mr. Diemer, in substance,
24 that when Mr. Lombardo got sick, he was the fellow

1 that told you to contact the secretary of state and
2 that they could help you?

3 A I respectfully refuse to testify based on
4 my privilege against self-incrimination under the
5 Fifth Amendment to the U.S. Constitution.

6 Q Do you know a Mr. Lombardo?

7 A I respectfully refuse to testify based on
8 my privilege against self-incrimination under the
9 Fifth Amendment to the U.S. Constitution.

10 Q In a different way, I presume the same
11 answer, who is Mr. Lombardo?

12 A I respectfully refuse to testify based on
13 my privilege against self-incrimination under the
14 Fifth Amendment to the U.S. Constitution.

15 Q Did you ever check license plate
16 information for Local 150?

17 A I respectfully refuse to testify based on
18 my privilege against self-incrimination under the
19 Fifth Amendment to the U.S. Constitution.

20 Q When did you first start checking license
21 plate information for Local 150?

22 A I respectfully refuse to testify based on
23 my privilege against self-incrimination under the
24 Fifth Amendment to the U.S. Constitution.

1 Q Do you know a man named Jim Sweeney?

2 A Yes.

3 Q Was he an assistant to the president of
4 Local 150?

5 A Yes.

6 Q And do you know a man named Jim Ness?

7 A Yes.

8 Q When Mr. Ness retired from Local 150, was
9 Mr. Sweeney appointed vice president to fill
10 Mr. Ness' spot?

11 A I respectfully refuse to testify based on
12 my privilege against self-incrimination under the
13 Fifth Amendment to the U.S. Constitution.

14 Q Do you know a man named Steve Sisco
15 (phonetic)?

16 A Yes.

17 Q Can you tell me what his job was at Local
18 150 while you were employed there?

19 A I respectfully refuse to testify based on
20 my privilege against self-incrimination under the
21 Fifth Amendment to the U.S. Constitution.

22 Q Did he do recording secretary or
23 corresponding secretary work?

24 A I respectfully refuse to testify based on

1 my privilege against self-incrimination under the
2 Fifth Amendment to the U.S. Constitution.

3 Q At Local 150, is there something called a
4 Municipality Department consisting of staff attorneys
5 and BAs when you were employed there?

6 A I respectfully refuse to testify based on
7 my privilege against self-incrimination under the
8 Fifth Amendment to the U.S. Constitution.

9 Q If I asked you any more questions about a
10 task force at Local 150 of any kind, would you answer
11 them the same way with respect to asserting --

12 A Taking the Fifth.

13 Q -- your Fifth Amendment right?

14 A I would.

15 Q Okay. Did Jim Sweeney have a secretary at
16 Local 150 when you were employed there?

17 A Yes.

18 Q Do you know who it was?

19 A During what time frame?

20 Q Well, let's say the last -- you left in
21 October of '06. How about '02 to '06?

22 A I think he had a couple.

23 Q Do you remember their names?

24 A Amy, Tammy.

1 Q Only first names?

2 A Amy, I can't remember her last name.

3 Q Tammy? Do you remember her last name?

4 A No.

5 Q Do you remember anybody else that may have
6 acted as secretary from '02 to '06 for Mr. Sweeney?

7 A To '06?

8 Q Um-hmm. Until you retired.

9 A Maybe Carol.

10 Q Do you remember her last name?

11 A Tiscarino (phonetic).

12 Q Tiscarino.

13 What about Steve Sisco? Did he have a
14 secretary assigned to him?

15 A Yes.

16 Q And do you remember her name, '02 to '06,
17 or his name?

18 A Lucille Mathis.

19 Q And was she with Mr. Sisco for that
20 four-year period until you retired?

21 A Yes.

22 Q What about Mr. Dugan? Did he have a
23 secretary?

24 A Yes.

1 Q Did he have the same secretary from '02 to
2 '06?

3 A Yes.

4 Q And what was her name or his name?

5 A Dorine Barah (phonetic).

6 Q And what about Jim Miller? Did he have a
7 secretary?

8 A Yes.

9 Q And from '02 to '06, who was assigned to
10 Jim Miller?

11 A I was.

12 Q And Mr. Ward, I think we already covered
13 that, you were Mr. Ward's secretary from '02 to '06?

14 A Um-hmm.

15 Q That was one of those "um-hmm"?

16 A Yes. I'm sorry.

17 Q Okay. All right. Thank you.

18 Do you know a lady named Camile that
19 worked for Local 150?

20 A Yes.

21 Q Do you know her last name?

22 A Makevis (phonetic).

23 Q What was her position? Who did she work
24 for, if you can focus in on from '02 to when you

1 retired in '06?

2 A All right. I respectfully refuse to
3 testify based on my privilege against
4 self-incrimination under the Fifth Amendment to the
5 U.S. Constitution.

6 Q Maybe I can get you to answer it a
7 different way, maybe not, but I'll try.

8 What is the Municipality Department at
9 Local 150?

10 A I respectfully refuse to testify based on
11 my privilege against self-incrimination under the
12 Fifth Amendment to the U.S. Constitution.

13 Q You weren't in it, right? You weren't in
14 the Municipality Department?

15 A Right.

16 Q The other people that I've asked you about
17 and that you've answered questions about, they
18 weren't in the Municipality Department?

19 A I respectfully refuse to testify based on
20 my privilege against self-incrimination under the
21 Fifth Amendment to the U.S. Constitution.

22 Q Do you know Jim McNally?

23 A Yes.

24 Q Was he inside or outside the Municipality

1 Department from '02 to '06?

2 A I respectfully refuse to testify based on
3 my privilege against self-incrimination under the
4 Fifth Amendment to the U.S. Constitution.

5 Q Did he have a secretary?

6 A What time frame?

7 Q '02 to '06?

8 A I don't think so.

9 Q Okay.

10 A I'm not sure.

11 Q Not sure?

12 A Not sure.

13 Q Did Mr. Dugan ever assign you to work for
14 anybody other than Mr. Ward and Mr. Miller from
15 '02 to '06, leaving aside accounting?

16 A I respectfully refuse to testify based on
17 my privilege against self-incrimination under the
18 Fifth Amendment to the U.S. Constitution.

19 Q Did you do work for nonlawyer business
20 agents during the period of time that you were
21 employed at Local 150?

22 A I respectfully refuse to testify based on
23 my privilege against self-incrimination under the
24 Fifth Amendment to the U.S. Constitution.

1 Q Before the year 2001, was there a time when
2 the location that you worked at was just one floor?

3 A Yes.

4 Q What was the address of the place that you
5 actually went to work every day at Local 150?

6 A 6200 Joliet Road.

7 Q And at some point in 2000, was there
8 remodeling adding a second floor to the building?

9 A I believe at that time, yes.

10 Q And before that, were you and the other
11 employees that worked for Local 150 all located on
12 the first floor?

13 A Yes.

14 Q And after there was a second floor added,
15 did you move your office?

16 A Yes.

17 Q And did you move to the second floor or
18 stay on the first floor?

19 A Second.

20 Q And did Mr. Dugan and Mr. Ward and
21 Mr. Miller get offices on the second floor at the
22 same time?

23 A Yes.

24 MR. POLALES: You didn't find the

1 letter?

2 MR. HANLON: No, I did not. It's not
3 in my bag. It's got to be in your file.

4 MR. POLALES: Yes, probably.

5 BY MR. POLALES:

6 Q Did you fill out a form for Mr. Miller to
7 order motor vehicle records from the Illinois
8 Secretary of State?

9 A I respectfully refuse to testify based on
10 my privilege against self-incrimination under the
11 Fifth Amendment to the U.S. Constitution.

12 Q Is it true that every check that was
13 written by Local 150 in your experience had to be
14 okayed by Mr. Dugan?

15 A Yes.

16 MR. HANLON: I didn't hear that.

17 THE WITNESS: Yes.

18 BY MR. POLALES:

19 Q If I showed you Mr. Miller's autograph,
20 would you recognize his handwriting?

21 MR. DIEMER: Before we go any further,
22 and Mr. Hanlon can confirm this, I've got the
23 deposition transcript, it's Magistrate Mahoney's
24 standing order that documents may not be introduced

1 at a deposition if they haven't been disclosed to all
2 of the parties 24 hours in advance.

3 MR. POLALES: Is it? That's too bad.

4 MR. HANLON: Are you looking for an
5 answer to me as to what Judge Mahoney says?

6 MR. POLALES: Yeah. Did we produce
7 any of these things?

8 MR. HANLON: We did not produce this,
9 no.

10 MR. POLALES: Okay.

11 MR. HANLON: But we did disclose it.

12 MR. POLALES: Oh, we did disclose it?

13 MR. HANLON: Yes. It was disclosed in
14 the 26(a) disclosure.

15 MR. POLALES: Did we give them copies?

16 MR. HANLON: We did not give them
17 copies.

18 MR. POLALES: Oh. They didn't ask for
19 copies, eh?

20 MR. HANLON: No.

21 MR. POLALES: Okay.

22 BY MR. POLALES:

23 Q Would you recognize Jim Miller's signature
24 if I showed it to you?

1 A I respectfully refuse to testify based on
2 my privilege against self-incrimination under the
3 Fifth Amendment to the U.S. Constitution.

4 Q Would you recognize computer disks of the
5 type that Local 150 used to check motor vehicle
6 records while you were employed there if I showed
7 them to you?

8 A I respectfully refuse to testify based on
9 my privilege against self-incrimination under the
10 Fifth to the U.S. Constitution.

11 Q Would you identify an affidavit that you
12 signed if I showed it to you?

13 A I respectfully refuse to testify based on
14 my privilege against self-incrimination under the
15 Fifth Amendment to the U.S. Constitution.

16 Q I'll ask it slightly different. With
17 respect to the disks and the documents, the disk, the
18 documents, and your affidavit, the document including
19 Mr. Miller's signature, if I showed them to you and
20 asked you to identify them, would you do so if you
21 could, or would you assert your Fifth Amendment right
22 to remain silent?

23 A I would assert my Fifth Amendment right.

24 Q If I showed you a printout of the contents

1 of the computer disk containing motor vehicle
2 records, would you identify it for me if you were
3 capable of doing so, or would you assert your Fifth
4 Amendment right?

5 A I would assert my Fifth Amendment right.

6 Q If I asked you any other question about
7 motor vehicle records, would you give me the same
8 answer? That is, would you answer it, or would you
9 assert your Fifth Amendment right?

10 A I would assert my Fifth Amendment rights.

11 Q When you were at Local 150, were you under
12 instruction that nobody got their hands on the motor
13 vehicle records?

14 A I respectfully refuse to testify based on
15 my privilege against self-incrimination under the
16 Fifth Amendment to the U.S. Constitution.

17 Q Were you told that you had to maintain
18 those records and that it was part of your job to
19 satisfy requests for information from those motor
20 vehicle records made to you by BAs and other union
21 officials and employees?

22 A I respectfully refuse to testify based on
23 my privilege against self-incrimination under the
24 Fifth Amendment to the U.S. Constitution.

1 Q Do you know if the CDs containing motor
2 vehicles records from the Illinois Secretary of State
3 were ever copied?

4 A I respectfully refuse to testify based on
5 my privilege against self-incrimination under the
6 Fifth Amendment to the U.S. Constitution.

7 Q Do you know whether there were any limits
8 put on the use of the motor vehicle record
9 information contained in the records obtained by
10 Local 150 from the Illinois Secretary of State?

11 A I respectfully refuse to testify based on
12 my privilege against self-incrimination under the
13 Fifth Amendment to the U.S. Constitution.

14 Q Are the attorneys that are employed by
15 Local 150 in the place where you worked, are they
16 business agents of Local 150?

17 MR. MILLER: Time frame.

18 MR. POLALES: '02 to '06, when you
19 retired.

20 MR. MILLER: If you know.

21 THE WITNESS: I don't know.

22 BY MR. POLALES:

23 Q You don't know?

24 A I don't know --

1 Q Okay.

2 A -- what they're considered. I don't know.

3 Q Is there a Christmas fund at Local 150 from
4 '02 to '06?

5 A I respectfully refuse to testify based on
6 my privilege against self-incrimination under the
7 Fifth Amendment to the U.S. Constitution.

8 Q Is there an assistance fund from '02 to
9 '06?

10 A Pardon? The what?

11 Q An assistance fund maintained at Local 150
12 from '02 to '06 while you were employed there.

13 A I respectfully refuse to testify based on
14 my privilege against self-incrimination under the
15 Fifth Amendment to the U.S. Constitution.

16 Q Do you know if assistance fund moneys were
17 used to pay for the purchase of the motor vehicle
18 records from the State of Illinois?

19 A I respectfully refuse to testify based on
20 my privilege against self-incrimination under the
21 Fifth Amendment to the U.S. Constitution.

22 Q Did Mr. Sisco ever ask you to use the motor
23 vehicle records information from the State of
24 Illinois to run plates for him?

1 A I respectfully refuse to testify based on
2 my privilege against self-incrimination under the
3 Fifth Amendment to the U.S. Constitution.

4 Q Did Mr. Sweeney ever ask you to do that?

5 A I respectfully refuse to testify based on
6 my privilege against self-incrimination under the
7 Fifth Amendment to the U.S. Constitution.

8 Q Did anyone else ever ask you to do that?

9 A Excuse me? What was that?

10 Q Did anyone ever else ask you to run license
11 plates?

12 A I respectfully refuse to testify based on
13 my privilege against self-incrimination under the
14 Fifth Amendment to the U.S. Constitution.

15 Q Did Mr. Bill Dugan ever ask you to do that?

16 A I respectfully refuse to testify based on
17 my privilege against self-incrimination under the
18 Fifth Amendment to the U.S. Constitution.

19 Q Is there a task force at Local 150?

20 A I respectfully refuse to testify based on
21 my privilege against self-incrimination under the
22 Fifth Amendment to the United States Constitution.

23 Q What is it? What is the task force? Same
24 answer?

1 A I respectfully refuse to testify based on
2 my privilege against self-incrimination under the
3 Fifth Amendment to the United States Constitution.

4 Q Do you know whether checks cut at Local 150
5 are -- do you know how they are printed and signed?

6 A I respectfully refuse to testify based on
7 my privilege against self-incrimination under the
8 Fifth Amendment to the U.S. Constitution.

9 Q Did you ever have communications with an
10 entity called IIIFFC?

11 A I respectfully refuse to testify based on
12 my privilege against self-incrimination under the
13 Fifth Amendment to the U.S. States Constitution.

14 Q Can you tell me what the initials stand
15 for?

16 A I respectfully refuse to testify based on
17 my privilege against self-incrimination under the
18 Fifth Amendment to the U.S. Constitution.

19 Q Do you know what the RFC office is?

20 A The what?

21 Q RFC.

22 A RFC?

23 Q Yeah.

24 A I don't know what that is.

1 Q Okay. Did you use e-mail in your
2 employment at Local 150?

3 A I respectfully refuse to testify based on
4 my privilege against self-incrimination under the
5 Fifth Amendment to the U.S. Constitution.

6 Q Did you use computers at Local 150 from
7 2002 to 2006?

8 A I respectfully refuse to testify based on
9 my privilege against self-incrimination under the
10 Fifth Amendment to the United States Constitution.

11 Q Is your husband a member of Local 150?

12 A Yes.

13 Q Are you a member of Local 150?

14 A No.

15 Q Your husband is retired and he is enjoying
16 a pension now?

17 A Yes.

18 Q And is he working part time?

19 A No.

20 Q Is he working full time?

21 A At home.

22 Q For you?

23 A I wish.

24 Q While you were employed at Local 150 in the

1 time frame 2002 to 2006, did you have business agents
2 contact you for license plate information?

3 A I respectfully refuse to testify based on
4 my privilege against self-incrimination under the
5 Fifth Amendment to the U.S. Constitution.

6 MR. POLALES: I don't think I have
7 anything else, but let me confer with my co-counsel
8 and see whether or not...

9 MR. HANLON: Do you want to step
10 outside?

11 MR. POLALES: Okay.

12 (Brief recess.)

13 BY MR. POLALES:

14 Q Ms. Soria, did you ever disclose
15 information contained in motor vehicle records to
16 anyone else?

17 A I respectfully refuse to testify based on
18 my privilege against self-incrimination under the
19 Fifth Amendment to the U.S. Constitution.

20 Q Do you have information as to whether Local
21 150 obtained -- disclosed motor vehicle information
22 to anyone else?

23 A I respectfully refuse to testify based on
24 my privilege against self-incrimination under the

1 Fifth Amendment to the U.S. Constitution.

2 Q Okay. Would you identify these disks if
3 I -- I'm showing Vehicle Services, Secretary of
4 State, issued October '04, two CDs. Would you
5 identify them?

6 A No.

7 Q Okay. And that's because you would --

8 A Invoke the fifth.

9 Q -- refuse to identify them because of your
10 Fifth Amendment privilege?

11 A Right.

12 Q If I asked you any other question relating
13 to the disclosure of motor vehicle information, motor
14 vehicle records, and personal information obtained by
15 Local 150 from the Illinois Secretary of State, would
16 you refuse to answer on the grounds that you have a
17 Fifth Amendment right to refuse?

18 A I would take my Fifth Amendment right to
19 refuse.

20 MR. POLALES: Okay. Then I don't
21 think I have anything else.

22 Mr. Diemer?

23 (No response.)

24 MR. POLALES: Okay.

1 Mr. Miller?

2 MR. MILLER: I have nothing.

3 MR. POLALES: Thank you very much, Ms.
4 Soria, for coming down and answering all of those
5 questions as best you could and as best you were
6 willing to. Thank you.

7 (Further deponent saith not.)

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1 REPORTER'S CERTIFICATE

2
3 The foregoing deposition of Linda
4 Soria, was taken before GARY SCHNEIDER, CSR, RPR, at
5 3500 Three First National Plaza, 70 West Madison,
6 Chicago, IL 60602 , in the City of Chicago, Cook
7 County, Illinois, commencing at 1:00 p.m., on May 28,
8 2008.

9 Said witness was first duly sworn by
10 me and then examined upon oral interrogatories. The
11 questions and answers were taken via machine
12 shorthand by the undersigned and reduced to
13 computerized transcription. The foregoing is an
14 accurate and complete record of said deposition.

15 The certificate annexed hereto applies
16 only to the original transcript or copies signed and
17 certified by me. I assume no responsibility for
18 copies reproduced beyond my direction or control.

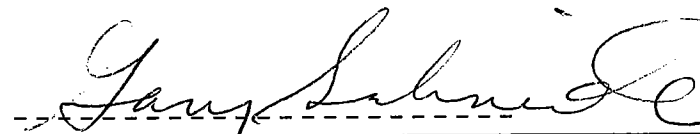
19 The signature of the witness was
20 reserved, and the transcript was submitted to the
21 deponent as per copy of the attached letter.

22 Pursuant to Rule 30(e) of the Rules of
23 Civil Procedure for the United States District
24 Courts, if the Witness does not read and sign the

1 transcript within 30 days, or make other arrangements
2 for reading and signing, the transcript may be used
3 as fully as though signed; and this certificate will
4 then evidence such failure to appear as the reason
5 for signature being waived.

6 The undersigned is not interested in
7 the case, nor is of kin or counsel to any of the
8 parties herein.

9 IN WITNESS WHEREOF, I hereunto affix
10 my hand as Certified Shorthand Reporter in and for
11 the State of Illinois, on June 4, 2008.

12
13 
14 _____
Gary Schneider, CSR, RPR
CSR No. 084-004029